

**IN THE SUPREME COURT OF OHIO**

STATE OF OHIO,	:	
	:	
Plaintiff-Appellee,	:	CASE NO. 2014-0120
	:	
v.	:	ON DISCRETIONARY APPEAL
	:	FROM THE MAHONING
BRANDON MOORE	:	COUNTY COURT OF APPEAL,
	:	SEVENTH APPELLATE DISTRICT,
Defendant-Appellant.	:	CASE NO. 08MA20

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**NOTICE OF SUPPLEMENTAL AUTHORITY**

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**NOTICE OF SUPPLEMENTAL AUTHORITY**

Appellant Brandon Moore, pursuant to Supreme Court Practice Rule 17.09(B), submits this notice of highly-relevant precedent decided today by the United States Supreme Court, which held that its decision in *Miller v. Alabama*, 567 U.S. \_\_ (2012), applies retroactively. The relevant citation is: *Montgomery v. Louisiana*, 577 U.S. \_\_ (2016), No. 14-280, slip op. at 22-23 (“In light of what this Court has said in *Roper*, *Graham*, and *Miller*,” juvenile defendants “must be given the opportunity to show their crime did not reflect irreparable corruption; and, if it did not, their hope for some years of life outside prison walls must be restored.”).

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing Notice of Supplemental Authority was served by regular, U.S. Mail, postage prepaid, to Paul J. Gains, Esq., Mahoning County Prosecutor, and Ralph Rivera, Esq., Assistant Mahoning County Prosecutor, 21 W. Boardman Street, 6th Floor, Youngstown, Ohio 44503, on this 25th day of January, 2016.

/s Rachel S. Bloomekatz

Rachel S. Bloomekatz